



Information Rights Team
Post Office Limited
Ground Floor
Finsbury Dials
20 Finsbury Street
London EC2Y 9AQ
033 3665 3951

Our reference: FOI2019/00318

Mr T Hallam
request-589178-0c1be635@whatdotheyknow.com

11 September 2019

Dear Mr Hallam,

Freedom of Information Request – FOI2019/00318

I am writing in response to your email received by Post Office Limited ("**Post Office**") on 15 July 2019, which I am dealing with under the terms of the Freedom of Information Act 2000 ("**FOIA**").

In your email you have requested the following information:

Please can you provide a copies of the mandatory training workbooks as described under the section HORIZON on your One Post office System link provided: <https://www.onepostoffice.co.uk/secure/learning-and-development/mandatory-training/>

I can confirm that we do hold the information you have requested, however Post Office considers that the information you have requested engages section 43(2) of the Act concerning likely prejudice to Commercial Interests and section 31, Law Enforcement.

Commercial Interests

Post Office considers that disclosure of information requested about the Post Office training workbooks would be likely to prejudice the commercial interests of Post Office. The workbooks contain commercial information which could affect Post Office and its partners which are likely to affect both Post Office and it partners by providing competitors with an unfair advantage.

Public Interest

As information has been exempted under section 43(2) of the act, a public interest test applies. This involves weighing the balance of public interest in maintaining the exemption or releasing the information. Post Office understands that there is public interest in promoting the transparency and understanding of matters which are of interest to the public. However, there is also strong public interest in ensuring that Post Office is able to operate in a fair marketplace regarding the competitive dialogue procedure and are not commercially damaged by the release of the information.

Law Enforcement

The information you have requested contains details on the training we provide to combat Anti-Money Laundering, Security Data protection and Anti-Bribery Corruption.

We consider that we are not obliged to disclose them as, pursuant to Section 31(1)(a) of FOIA, disclosure of such information would be likely to prejudice the prevention and detection of crime. Our reasons for this are as follows:

Would be likely to prejudice the prevention of crime

There is a genuine risk that the disclosure of a full collective list of our internal Horizon Training Workbooks and materials, would be likely to provide criminals with security feature information which could be used by them for fraudulent purposes.

We would not want these internal training documents which provide details of crimes we have encountered and ways to identify these crimes to be made available in a way that puts branches at risk of increased attempted fraudulent activity. As such we consider that it is likely that disclosing the workbooks would prejudice the prevention and detection of crime.

Public Interest

As Section 31 (1)(a) FOIA is a qualified exemption, a public interest test applies. Post Office considers that the public interest in withholding this information outweighs the public interest in disclosing it and that therefore the information is exempt from disclosure, on the following basis:

Post Office recognises that there is a general public interest in disclosing information about its affairs, as greater transparency enables public authorities to be more open and accountable to the public for spend and the development of key relationships and partnerships and the effect those relationships have on its strategy and direction. However we see little public interest in internal Post Office branch identification numbers as we see little benefit to the public of having this information.

However, there is a compelling public interest in maintaining the effectiveness of Post Office branch security measures which are designed to protect against and combat fraud, including minimising the opportunities for criminals to commit fraud. Post Office systems and processes are designed to protect Post Office and third parties and therefore to protect taxpayer money from fraud. We consider that this aim serves a greater public interest than the public interest therefore consider that the public interest lies in maintaining the exemption and withholding the requested information.

I am sorry I could not provide you with the information you requested on this occasion, however if you are dissatisfied with the handling of this response, you do have a right to request an internal review. You can do this by writing to the address below stating your reasons for your internal review request.

Information Rights Manager
Post Office Limited
Information Rights Team
Ground Floor
Finsbury Dials
20 Finsbury Street
London
EC2Y 9AQ
information.rights@postoffice.co.uk

If, having requested an internal review by Post Office, you are still not satisfied with our response you also have a right of appeal to the Information Commissioner at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113
<https://ico.org.uk>

Yours sincerely,

A handwritten signature in black ink, appearing to read 'KM', enclosed in a thin black rectangular border.

Kerry Moodie
Information Rights Team
information.rights@postoffice.co.uk
<http://corporate.postoffice.co.uk/access-information>
@postofficenews

Post Office Limited is committed to protecting your privacy, information about how we do this can be found on our website at www.postoffice.co.uk/privacy